

EXHIBIT A

5

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
LEE COUNTY, ILLINOIS

HEATHER STUDER
Plaintiff,

v.

KATHERINE SHAW BETHEA
HOSPITAL,
Defendant

No. 2015 SC

497

Summons

To: Katherine Shaw Bethea Hospital c/o Joseph E. Heaton, Jr. 226 W. River Street, Dixon, IL 61021

You are summoned and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, in the office of the clerk of this court within 30 days after service of this summons, not counting the day of service. If you fail to do so, a judgment by default may be entered against you for the relief asked in this complaint.

To the officer:

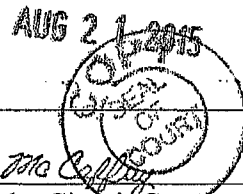
This summons must be returned by the officer or other person to whom it was given for service, with endorsements of service and fees, if any, immediately after service. If service cannot be made, this summons shall be returned so endorsed.

This summons may not be served later than 30 days after its date.

SEAL OF THE COURT

Witness

Denise A. McCallister
Clerk of the Circuit Court



William H.T. Lee
Attorney for Plaintiff
Ludens Potter & Melton
600 W. Lincolnway
Morrison, IL 61270
(815) 772-2161

Date of Service: _____, 20____. By _____, Deputy

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
LEE COUNTY, ILLINOIS

HEATHER STUDER,
Plaintiff,

v.

KATHERINE SHAW BETHEA
HOSPITAL,
Defendant.

No. 2015 SC

497

FILED
AUG 21 2015
Demetrius A. Williams
LEE COUNTY CIRCUIT CLERK

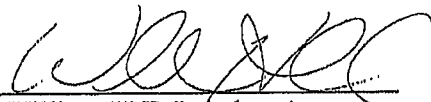
COMPLAINT

NOW COMES the Plaintiff, HEATHER STUDER, and complains of the Defendant, KSB HOSPITAL, as follows:

1. Plaintiff is a resident of Lee County, State of Illinois.
2. Defendant, Katherine Shaw Bethea Hospital, hereinafter "KSB", is a private hospital with their principal place of business located at 403 E. 1st St., Dixon, Lee County, Illinois.
3. Plaintiff was employed by KSB as an Occupational Therapist working at their principal place of business at a rate of \$31.19 per hour.
4. Plaintiff performed her job and in exchange received various fringe benefits. One of those benefits is called "PDL", or paid days leave. Plaintiff had 171.12 hours of PDL time in her time bank on the date she resigned.
5. KSB willfully failed to pay the Plaintiff's final compensation as directed by 820 ILCS 115/5 or, alternatively, deducted the PDL from Plaintiff's wages without her written consent as required by 820 ILCS 115/9.

WHEREFORE, Plaintiff requests a finding that KSB's violation of the Illinois Wage Payment and Collection Act was willful and Plaintiff further requests all damages authorized by the Illinois Wage Payment and Collection Act, including but not limited to attorney's fees, court costs, and interest, as well as the repayment of \$5,337.23, the pre-tax amount of PDL.

HEATHER STUDER, Plaintiff,

By: 
William H.T. Lee, her Attorney

Drafted by:
William H.T. Lee, 6300324
Attorney for Plaintiff
Ludens Potter & Melton
600 W. Lincolnway
Morrison, IL 61270
(815) 772 2161